1) **Purpose of Monitoring**
- Ensure the programs comply with appropriate policies and procedures and operate within the parameters established by law, regulations, *Division of Workforce Solutions Workforce Programs Guide* and other program guidelines;
- Assess the quality of services provided to program participants and employers, and where appropriate, make recommendations for improvement;
- Provide technical assistance as needed or requested;
- Identify system wide issues requiring policy or program review and resolution; and
- Identify best practices to be shared with others in the workforce development system.

2) **Annual Timeline and Process**
- **October-January**: Prepare for upcoming monitoring by identifying areas to be monitored and update/develop monitoring guides accordingly. This is based on new policies, performance measures, and issues that arise during the program year.
- **February**: Distribute finalized monitoring packet to the workforce development boards (WDB) and post on the Workforce Investment Act (WIA) website.
- **February-March**: Local Program Liaisons (LPL) contact their respective WDBs to set up monitoring dates.
- **March –June**: LPLs conduct on-site monitoring at their WDBs according to the schedule.
- **June-August**: LPLs distribute monitoring reports to their respective WDBs.   WDBs are required to submit written responses to findings only. Responding to observations is only required if specifically directed in the report. LPLs review responses to ensure satisfactory action has been taken by the WDB. A monitoring close-out letter is then sent to the WDB.

3) **Monitoring Website Location** – Monitoring guides are posted on the DWS Website upon development. This site address is:
  http://www.dwd.state.wi.us/dwdwia/monitoring.htm

4) **Program Year (PY) 2005 Monitoring Guides**
- WIA Monitoring Survey – Completed by local WDB and submitted to LPL prior to the onsite visit. It primarily collects local policies and a list of service providers.
- WIA Adult, Dislocated Worker, and Special Response File Reviews
- WIA Youth Program Interview
- WIA Youth Participant File Reviews
- On-the-Job (OJT) Contracts
- Fiscal and Administrative Systems Interview
- WIA Local Plan Phase 1 and 2 Follow-Up Interview
- Monitoring Process Utilized by the WDB
- Exclusionary Exits Documentation – Check to ensure that all exclusionary exits reported in the previous performance year were adequately documented.
- Supplemental Employment Documentation - Check to ensure that all supplemental employment reported in the previous performance year were adequately documented in the files.
- Corrective Action Plan Follow-Up – Four WDBs (Southeast, Milwaukee, Western, and South Central) were required to submit PY04 Corrective Action Plans in March

2005. There was not a formal monitoring guide; but their general status was discussed.

5) **LPL Preparations for Onsite Monitoring**
- Monitoring Survey Completed by WDBs – The WDB must mail this to the LPL two weeks in advance of the onsite visit. The LPL uses it to prepare for the onsite visit.
- LPL selects the files to be reviewed and provides the ASSET Personal Identification Numbers (PIN) to the WDB two weeks prior to the onsite visit. To ensure a variety of files, an array of selection criteria is used. (i.e., received core and intensive services only, received a training service, received an On-the-Job (OJT) service, received a hard exit, received a soft exit, co-enrolled in two programs such as TAA and a Special Response grant, youth who received design framework services only, youth with no skill attainment goals, basic skill deficient youth, etc.).
- LPL conducts a pre-review of the selected files in ASSET and prints out necessary ASSET screens to take along on the onsite monitoring visit.

6) **Key Items Checked in Participant File Reviews**
- Eligibility is done accurately and documented.
- Assessments are completed and Individual Employment Plans/Individual Service Strategies are based on the assessments.
- Services are provided in accordance with local, state, and federal policy.
- Services for co-enrolled participants are appropriately coordinated between programs/case managers.
- Services entered in ASSET, the participant's employment plan, and case notes are in agreement, reinforce each other, and represent solid case management to maximize the participant's outcomes.
- Case notes are thorough and regularly entered (preferably in ASSET).
- Follow-up services are provided according to local, state, and federal policy.
- Required documents appear in the file such as signed local applications, participant rights forms, release-of-information forms, proof of NTO orientation, Pell/Financial Aid, activity sheets supporting services and payments, proof of credentials, proof of skill attainment goals being set and completed, and exit/outcome information.

7) **PY05 Findings (13 Findings Statewide)**
- Exclusionary Exit was taken for an inappropriate reason or documentation was either missing or insufficient.
- A few files scheduled for monitoring of supplemental employment documentation had been shredded prior to monitoring which is a violation of records retention.
- Inappropriate reimbursement was made on car repairs.
- File was missing documentation to show the participant applied for financial aid.
- File was missing selective service registration.
- Youth program services were provided prior to the participants being determined eligible and registered in WIA.
- Youth eligibility problems were made in relation to family size, countable income, etc.
- No evidence of follow-up services being provided to youth for the required 12 months after exit.

8) **PY05 Observations (50 Observations Statewide)**
- Poor case notes--gaps in how often entered, not complete, too brief, and do not document the participant's activities and progress in the program.
- Assessments were weak, missing, or did not support the activities contained in the Employment Plan or Individual Service Strategy.
- Employment Plans and Individual Service Strategies are not regularly updated, do not have signatures, do not have employment goals, or are very general.
- Documentation Verification Form verifying eligibility criteria such as age and eligible to work in the USA do not provide sufficient identifier detail such as document date, reference number, issuer, and source.
- Dislocated worker file did not contain documentation of layoff. The preferred documentation is the participant's layoff letter received from their employer.
- Birth certificates and driver's licenses were photocopied.
- Participants are identified as veterans, but their files did not contain a copy of the DD-214 form for data validation purposes.
- Files are missing signed WIA registration forms which are useful for data validation.
- CARES printouts appeared in a few files. CARES should not be used to validate eligibility and participant information for WIA or other programs. (Chapter 49.83, Wisconsin Statutes).
- Files are missing thorough and/or signed release of information forms. Forms should include what can be released, to whom, and effective dates/duration of the release.
- Files are missing signed Participant Rights Forms.
- Actual start and end dates are not accurately entered in ASSET (they do not match up to file documentation or case notes, the close date is not entered, a start date is entered when the service was cancelled, etc.).
- ITA Program and/or Employment Outcome fields are not completed in ASSET and these are required fields.
- Credentials are not reported in ASSET when the participant completed the training.
- Credential attainment dates reported in ASSET do not agree with the documentation or case notes.
- Credentials reported in ASSET do not have acceptable documentation to support their attainment.
- Planned gap in services were not taken when they would have been appropriate.
- Participants are kept in active status when exit might have been more appropriate such as 90 days or more of unsuccessful attempts to contact the participant.
- Follow-up services are not provided per the local policy or entered into ASSET.
- Youth stayed in design framework status for six months or longer.
- Younger youth do not always have skill attainment goals set or they are not regularly set, are weak, or their planned date of attainment was not within 364 days of the date set.
- Youth files have missing or insufficient documentation to support the type of skill attainment goal set, when it was set, proof that it was attained and the date.
- GED/HSED completion is not documented with acceptable proof which includes school records, transcript, copy of the certificate, or a notice from the school.
- Youth participants received summer employment only and WIA is intended to be a year-round, comprehensive programmatic approach.

- Supportive services were not provided in accordance with state or local policy.
- Veterans Priority of Service is not being followed as directed in TEGL 05-03, WIA Policy Update 04-03, and Veterans Program Letter 01-05.
- Services for co-enrolled participants were not appropriately coordinated between programs.
- OJT contracts were inappropriate for the participant, missing required information, did not have required signatures, were not properly monitored at the local level, or the participant started the OJT before it was signed.
- Customized Skills Training occurred but no training plan or worksite agreement was found in the file to document it.
- Supplemental employment data was not found in the participant files, the documentation was not acceptable, or the case manager inadvertently entered supplemental employment information in the ASSET Manage Follow-Up Services data fields.

9) **PY05 Technical Assistance Issues**

1) Why does the WDB need to be responsible for National Association of Workforce Development Professional (NAWDP) credentialing of Job Center staff when these programs have their own funding? In fact, many of these staff are from DWD funded programs such as Job Service, Division of Vocational Rehabilitation, TANF contracted staff, etc.

   Response: DWD does not necessarily expect the WDB to pay for the costs of all credentialing; but, the WDB is expected to oversee this effort.

2) Could the capability be added to ASSET to post the same case note in multiple participant files after exit?

   Response: The WDB was directed to discuss this request at an ASSET Users Group meeting to see if others are interested in this change also. If so, the ASSET Users Group could ask DWS to develop and submit a Programming Change Request (PCR) to implement this capability. This is the official form for requesting information technology changes to programs.

3) The WDB had the following supplemental earnings questions:
- Is there any reason to remove the supplemental employment data in ASSET for the participants reported under PY04?
- Local staff would like to know if completing certain data fields in ASSET when the "Necessary" flag is set will automatically place the participant into supplemental employment data reporting status. These fields are: "was this person employed at any time during this quarter" and "For Local Management Reporting: Employer and Hourly Wage".
- When does DWD complete the "Necessary" or "Not Necessary" flag in the ASSET Follow-up Status screens? (i.e., beginning of quarter, end of quarter, etc.)
- How can DWD monitor WDBs for this documentation when many of the exits listed on the Supplemental Data Verification List occurred before the instructional memos

and policy updates were distributed? In addition, there was a certain amount of malfunction and ongoing changes along the way which were hard to work with.

Response: There is no need to remove the supplemental employment data entered in ASSET for the PY04 participants. This is because PY04 performance is past—it was submitted to Department of Labor in September 2005. DWS is classifying unacceptable or missing documentation for supplemental employment data as an observation versus a finding in PY05 monitoring. DWS will continue to monitor for this documentation in future program years but inadequacies will be classified as a finding instead. WIA Policy Update 04-07 originally published 07/01/04 and updated on 11/30/05, the Draft Supplemental Employment Data Technical Assistance Guide dated August 2005, and its most recent addendum released June 30, 2006 are available to provide guidance on how the supplemental employment data process works.

4) Can in-school youth become an out-of-school youth (i.e., when they graduate and have diploma but are still basic skills deficient and WIA program continues to serve)?

Response: Youth eligibility and school status is determined only at the time of initial registration (see 20 CFR 664.200 and 664.310). Misclassification of in-school youth would also affect the calculation of the expenditures for out-of-school youth. Staff should identify those youth who were incorrectly considered out-of-school youth and correct the records and any applicable out-of-school expenditure allocations.

5) Can receipt of Free School Lunch be used to document low-income status for youth eligibility?

Response: Receipt of free school lunch to document low income status is still permitted. While the current regulations do not permit its usage (see Section 664.240 of the regulations), the old policy guidance (issued February 2002) has not been changed. The language to allow this provision as a low income qualifier continues to reappear in various versions of the WIA reauthorization bills that Congress keeps introducing. If the intent is to restore this to the low income definition, we don't believe it makes sense to change our policy now - only to have to change it back again if and when reauthorization finally occurs. However, we encourage case managers to use other acceptable forms of documentation when available and only use receipt of free lunch as a last alternative.

6) WDB staff requested guidance on writing case notes.

Response: There is a "Writing Effective Case Notes" in the proposed Wisconsin Statewide TAT plan, tentatively scheduled for Fall, 2006.

7) WDB staff expressed concerns about the 35% high wage training requirement. What affect will this re-direction of funding have on Job Centers?

Response: Beginning July 1, 2006, WDBs will be required to allocate 35% of their Adult, Dislocated Worker and Special Response grants (less the 10% for administration) to training and training supports leading to high wage jobs. If local

areas have difficulty meeting this goal, it will not be a monitoring finding; however, they will have to provide an explanation of why the goal was not met.

8) A WDB recommended that DWD designate a "liaison" dedicated to answering Central Office Reporting System (CORe) questions from local staff.

   Response: Amy Johnson, DWD, is the designated liaison to assist local areas with CORe questions. Her telephone number is (608) 266-7847 and her e-mail is amy.johnnson@dwd.state.wi.us

9) WDB staff questioned if a written code of conduct is required for their procurement policy.

   Response: DWS Workforce Programs Guide (page 1-42) states "each grantee must maintain a written code of conduct that provides standards governing the performance of its officers, employees, or agents engaged in the awarding and administration of contracts and grants using DWS funds. These standards must address the following: a) conflict of interest, b) nepotism, c) gratuities and favors, and d) penalties." The WDB's local procurement policy should be updated to include these elements.

10) The following items were identified as needing clarification and guidance at the local level. These will be shared with DWS management for appropriate action.

- Clarification on the definition of veterans and their spouses under WIA since it appears to be different than what Job Service uses in their LVER and DVOP Veteran Programs.
- Clarification/definition of the term "cash public assistance".
- Guidance on how to manage the 5% eligibility window for youth.
- Guidance on how to garner funding from all the partner agencies to maintain the capacity of the resource centers throughout the WDA.

11) WDBs suggested the following items need improvement. These will be shared with DWS management for appropriate action.

- Timely ASSET Performance Reports are needed to effectively track local performance.
- WebIntelligence (WebI) training should be provided.
- The ASSET User Manual should be updated on an ongoing basis.
- The ITA website has been improved; however, the list itself needs to be purged and is becoming more and more obsolete. With the new credential definition policy and 35% goal, some of the trainers on the ITA list do not meet the requirements. Also, the WDB questions why other programs do not use the ITA list such as W-2. It's a resource created by DWD, yet is poorly managed and under-utilized.